

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

INDUSTRIA DE ALIMENTOS ZENÚ S.A.S.,

Plaintiff,

v.

LATINFOOD U.S. CORP. d/b/a ZENÚ  
PRODUCTS CO. and WILSON ZULUAGA

Defendants/Counter Plaintiff,

LATINFOOD U.S. CORP. d/b/a ZENÚ  
PRODUCTS CO.,

Defendant/Counter Plaintiff

v.

INDUSTRIA DE ALIMENTOS ZENÚ S.A.S  
and CORDIALSA USA, INC.

Counter Defendants.

Civil Action No: 2:16-CV-06576-  
(CCC)(MAH)

**[PROPOSED] ORDER FOR  
ATTORNEYS' FEES AND COSTS**

Upon consideration of Defendants Latinfood U.S. Corp. d/b/a Zenú Products Co. and Wilson Zuluaga (collectively “Latinfood” or “Defendants”) motion pursuant to the Court’s inherent powers to offset from any fee award to Plaintiff, Industria de Alimentos Zenú S.A.S. (“Plaintiff”), all attorneys’ fees and costs expended by Defendants’ counsel and Michael Saffer, Esq. in making a second fee opposition submission, which was due solely to Industria’s initial and deficient fee application; and due notice having been given to Plaintiff; and the Court having read and considered the submissions of the parties, including the concurrently filed Defendants’ opposition to Plaintiff’s 2<sup>nd</sup> Fee Application (including the Supplemental Declarations of Mark J. Ingber and Michael Saffer, Esq., and for good cause shown:

**IT IS HEREBY ORDERED** that:

**Defendants' Motion is GRANTED;**

**AND IT IS FURTHER ORDERED** that within twenty-one days of the entry of this Order, Defendants will submit an affidavit setting forth the attorneys' fees and costs associated with in making a second fee opposition submission.

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Hon.